

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

IN RE:)	
)	
PIN OAK PROPERTIES, LLC)	CASE NO.: <u>17-bk-00608</u>
Debtor.)	CHAPTER 11

**DEBTOR'S APPLICATION TO ASSUME
EXECUTORY INSURANCE CONTRACT**

TO THE HONORABLE PATRICK M. FLATLEY, U.S. BANKRUPTCY JUDGE:

1. The Debtor filed a voluntary petition for relief under Chapter 11 of Title 11, United States Code, on June 7, 2017.

2. The Debtor's currently carries a commercial liability policy through Traveler's Insurance Company.

3. The Debtor is current with all of its regular quarterly insurance premiums.

4. The Debtor needs to maintain its commercial liability insurance with Traveler's Insurance Company to continue to operate its business during the Chapter 11 reorganization.

5. Based on the foregoing, pursuant to the provision of 11 U.S.C. 365 and Rule 6006 of the Rules, Debtor respectfully requests the Court's approval of the Debtor's assumption of Pin Oak Properties, LLC's, executory insurance contract with Traveler's Insurance Company.

WHEREFORE, the Debtor requests an Order approving the assumption of the Executory Insurance Contract and approval of the Agreement between Pin Oak Properties, LLC and Traveler's Insurance Company and for other relief as the Court deems appropriate.

DATED: June 7, 2017

GIANOLA, BARNUM, BECHTEL & JECKLIN , L.C.

s/ David M. Jecklin

David M. Jecklin, Esquire
W.V. Bar No. 9678
Gianola, Barnum, Bechtel & Jecklin, L.C.
1714 Mileground
Morgantown, WV 26505
304-291-6300

CERTIFICATE OF MAILING

I, David M. Jecklin, certify that I served the foregoing Debtor's Application to Assume Executory Insurance Contract the parties listed below, by e-filing or mailing a true copy by United States First Class Mail, postage prepaid, this 7th day of June 2017.

s/ David M. Jecklin

David M. Jecklin, Esquire
W.V. Bar No. 9678
Gianola, Barnum, Bechtel & Jecklin,
L.C.
1714 Mileground
Morgantown, WV 26505
304-291-6300